LUKE A. BUSBY, ESQ Nevada Bar No. 10319 LUKE ANDREW BUSBY, LTD. 316 California Ave 82 Reno, Nevada 89509 775-453-0112 luke@lukeandrewbusbyltd.com Attorney for the Plaintiff 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA 7 8 MICHAEL ERWINE. Case No.: 3:18-cv-00461-RCJ WGC 10 Plaintiff, VS. 11 CHURCHILL COUNTY, a political STIPULATED AMENDED subdivision of the State of Nevada; and **DISCOVERY PLAN AND** *12* DOES 1 through 10 inclusive; SCHEDULING ORDER 13 Defendants. 14 15 16 Plaintiff and Defendant hereby submit the following Stipulated Proposed 17 Amended Discovery Plan and Scheduling Order in the above captioned matter in 18 accordance with the Court's August 3, 2020 order. 19 Information Requested by Fed. R. Civ. P. 26(f): Α. 20 1. No changes in limitations, other than those set forth below, set by 21 either the Federal Rules of Civil Procedure or Local Rules for the District of Nevadal 22 are requested at this time. 23 B. **Amended Discovery and Other Deadlines:** 24 1. Discovery Cut-Off Date: 25 All discovery must be completed no later than Tuesday, December 1, 26 2020. 27 2. Disclosures (Experts): 28

The last day for disclosures required by Fed. R. Civ. P. 26(a)(2) concerning experts shall be **Wednesday**, **September 2**, **2020**. The last day for disclosures regarding rebuttal experts shall be **Friday October 2**, **2020**.

3. Dispositive Motions:

The parties shall file dispositive motions not more than thirty (30) days after the discovery cut-off date and, therefore, not later than **Thursday**, **December 31**, **2020**.

4. Pretrial Order:

If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint Pretrial Order shall be filed not more than thirty (30) days after the close of discovery and, therefore, not later than Friday, February 19, 2021. In the event dispositive motions are filed, the last day to file the Joint Pretrial Order shall be suspended until thirty (30) days after the ruling on the dispositive motions.

C. Additional Deadlines:

1. Extensions or Modifications of the Discovery Plan and Scheduling Order:

A stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty-one (21) days prior to the discovery deadline sought to be extended.

DATED this Friday, August 7, 2020

By: <u>/s/ Katherine Parks, Esq.</u>

KATHERINE F. PARKS, ESQ.

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Case 3:18-cv-00461-RCJ-WGC Document 65 Filed 08/11/20 Page 3 of 3